

FILED

SEP 27 2018

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

KRZYSZTOF RAK,
CHRISTOPHER J. DOSS,
DONALD HOLMES, SR., a.k.a. "Big Don,"
and IVAN WALTON

No. 18 CR 356

Violations: Title 18, United
States Code, Sections
1956(a)(2)(A) and 1956(h), and
Title 21, United States Code,
Sections 841(a)(1) and 846

JUDGE SHAH

COUNT ONE

MAGISTRATE JUDGE MARTIN

The SPECIAL JULY 2018 GRAND JURY charges:

Beginning no later than in or about July 2017, and continuing to at least on or about March 19, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KRZYSZTOF RAK,
CHRISTOPHER J. DOSS,
DONALD HOLMES, SR., a.k.a. "Big Don," and
IVAN WALTON,

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, and one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States

Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

COUNT TWO

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about March 19, 2018, at Matteson, in the Northern District of Illinois, Eastern Division, and elsewhere,

KRZYSZTOF RAK and
CHRISTOPHER J. DOSS,

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THREE

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about March 19, 2018, at Matteson, in the Northern District of Illinois, Eastern Division, and elsewhere,

DONALD HOLMES, SR.,
a.k.a. "Big Don,"

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FOUR

The SPECIAL JULY 2018 GRAND JURY further charges:

Beginning in or about July 2017 and continuing until on or about March 19, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KRZYSZTOF RAK,
DONALD HOLMES, SR., a.k.a. "Big Don," and
IVAN WALTON,

defendants herein, did conspire with each other and with other persons known and unknown to the Grand Jury, to commit an offense in violation of Title 18, United States Code, Section 1956, namely to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside of the United States with the intent to promote the carrying on of a specified unlawful activity, namely, felony violations of Title 21, United States Code, Sections 841 and 846 involving buying, selling, and otherwise dealing in a controlled substance, in violation of Title 18, United States Code, Section 1956(a)(2)(A);

In violation of Title 18, United States Code, Section 1956(h).

COUNT FIVE

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about March 3, 2018, at Olympia Fields, in the Northern District of Illinois, Eastern Division, and elsewhere,

KRZYSZTOF RAK,

defendant herein, did transfer funds, that is, approximately \$500 in United States Currency, from a place in the United States, that is Olympia Fields, Illinois, to a place outside the United States, that is Mexico, with the intent to promote the carrying on of specified unlawful activity, that is the felonious buying and selling and otherwise dealing in a controlled substance;

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

COUNT SIX

The SPECIAL JULY 2018 GRAND JURY further charges:

On or about March 7, 2018, at Chicago Heights, in the Northern District of Illinois, Eastern Division, and elsewhere,

KRZYSZTOF RAK,

defendant herein, did transfer funds, that is, approximately \$1,000 in United States Currency, from a place in the United States, that is Chicago Heights, Illinois, to a place outside the United States, that is Mexico, with the intent to promote the carrying on of specified unlawful activity, that is the felonious buying and selling and otherwise dealing in a controlled substance;

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY